

## **FINAL 2015 CoC Reallocation Plan Iowa Balance of State**

*Approved by the Iowa Council on Homelessness Executive Committee on October 1, 2015.*

*Plan is based on recommendations from the council's Continuum of Care (CoC) Committee.*

*Additional background information is available in the document, DRAFT 2015 Iowa Balance of State CoC Reallocation Plan, for Stakeholder Comment, dated September 3, 2015.*

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### **Approved Plan:**

#### **Introduction:**

At their meeting on September 24, 2015, the CoC Committee reviewed the DRAFT 2015 Iowa Balance of State CoC Reallocation Plan, for Stakeholder Comment, *dated September 3, 2015*. The committee voted in the affirmative for all of the proposed methods for Involuntary Reallocations. The committee voted in the affirmative for much of the proposed method for Voluntary Reallocations. For ease of review, in the language below, additions are underlined and eliminated items are crossed out.

#### **Involuntary Reallocations:**

- 1) *Full reallocation for low score:* Reallocate all funds from the lowest-scoring project in the 2015 CoC Renewal Project Competition. This project scored 56.5 points out of 100, which is 13 points lower than the next-lowest-scoring project. It also earned the lowest score in the 2014 CoC Renewal Project Competition.
  - *Project impacted: Manasseh House's Operation Empower: \$80,160. Retained: \$0.*
    - **Subtotal reallocated: \$80,160**
- 2) *Partial reallocation for unspent funds:* Reallocate unspent funds (only up to 2015 Grant Inventory Worksheet amount), according to projects' most-recently-submitted APR. If a project had unspent funds and also scored in one of the tiers identified below for partial reallocation, the reduction for unspent funds will be taken first, then the percentage reduction according to the score.
  - *Projects impacted:*
    - *Community Housing Initiatives' TH: \$49,936 of \$227,288. Retained by project: see below.*
    - *CCIA Home to Stay PH: \$16,107 of \$76,563. Retained by project: see below.*
    - *Mason City Housing Authority S+C: \$1,765 of \$103,119. Retained by project: \$101,354.*
    - *Vera French PH: \$3,372 of \$36,919. Retained by project: \$33,547.*
    - **Subtotal reallocated: \$71,180**

- 3) *Partial reallocation of 20% for score*: Reallocate 20% of funds from the next-lowest-scoring three renewal projects, with these projects retaining 80% of their previous funds. This includes projects scoring 69.5, 70, and 70 points out of 100.
  - *Projects impacted*:
    - *Community Housing Initiatives' TH: \$35,470 of \$177,352 remaining after reallocation for unspent funds. Retained by project: \$141,882.*
    - *Humility of Mary Housing's REACH 2000 TH: \$7,609 of \$38,047. Retained by project: \$30,438.*
    - *CCLA's Home to Stay PH: \$12,091 of \$60,456 remaining after reallocation for unspent funds. Retained by project: \$48,365.*
    - **Subtotal reallocated: \$55,170**
- 4) *Partial reallocation of 10% for score*: Reallocate 10% of funds from the next-lowest-scoring three renewal projects, with these projects retaining 90% of their previous funds. This includes projects scoring 75, 76, and 78 points out of 100.
  - *Projects impacted*:
    - *HACAP Chronically Homeless SSO: \$2,725 of \$27,259*
    - *Salvation Army, Men's TH: \$9,424 of \$94,241*
    - *Opening Doors, Maria House TH: \$4,302 of \$43,025*
    - **Subtotal reallocated: \$16,451**
- 5) All funds freed through involuntary reallocations may be made available for one or more new projects. If no new project applications are submitted, funds will remain available for the original renewal projects.
- 6) Project applicants that are subject to partial involuntary reallocation must develop a plan to continue with their renewal project, with the reduced level of funding. This includes HUD contract compliance for numbers of persons served and the types of services provided. It may be possible to seek a contract amendment from HUD for some changes; applicants should contact their HUD representative to discuss any options for amendment. If the reduction in funding will result in loss of assistance for persons currently served by the program, the applicant must develop a transition plan for these persons. Any concerns should be brought to the CoC. Alternatively, the applicant may follow the process described below for Combination Voluntary and Involuntary Reallocation.
  - **Total funds available through involuntary reallocation for new project(s): \$222,961**

### **Voluntary Reallocations:**

- *Wholly voluntary reallocation*: For projects not listed above for involuntary reallocation, an applicant may choose to reallocate funds from an existing renewal project, to free additional funds for one or more new projects. If the same applicant wishes to apply for a new project using those same funds, the following parameters apply:
  - The applicant may choose to reallocate all or a portion of their renewal funds to create the new project.
  - The applicant will have “first rights” to the funds that are freed as a result.

- The applicant may also choose to compete for a portion or all of the funds available to the CoC through involuntary reallocation of other projects or bonus funds. In this case, the applicant would be subject to competitive review along with other new project applicants. Any additional funding will depend on the scoring. If the applicant does not score well enough to be competitive for additional funding, it may still submit the new project using just their own voluntarily reallocated funds.
  - The applicant will be required to submit a new project application for review by the CoC Committee and/or Executive Committee. If the application is accepted, the applicant will then be required to submit the application in Esnap, following all usual HUD requirements for new projects.
  - The Iowa Council on Homelessness retains final approval for the new project to be included in the official Consolidated Application to HUD.
  - If, for any reason, the Iowa Council on Homelessness does not approve the new project, the same applicant may instead submit the original renewal project instead. In this way, the applicant choosing to voluntarily reallocate to a new project avoids the risk that the new project will be rejected by the Iowa Council on Homelessness and funds lost as a result.
  - All projects are subject to final consideration by HUD for funding. Approval by the Iowa Council on Homelessness does not guarantee that a project will be funded by HUD.
  - *Combination voluntary and involuntary reallocation:* For projects that are listed above for partial involuntary reallocation, an applicant may choose to also follow the process for voluntary reallocation.
    - If choosing this, the applicant has “first rights” to only the portion of funds that are retained after involuntary reallocation.
    - Otherwise, all the same parameters apply as described above.
    - This includes the option to compete with other new projects for additional funds available to the CoC through involuntary reallocation.
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